

# BLANKROME

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June 16, 2020

## **VIA ECF**

Hon. Rachel P. Kovner  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Benitez et al v. Springville Partners, LLC,*  
1:20-cv-01870-RPK-SMG**

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Dear Judge Kovner:

Our firm represents Defendant Springville Partners, LLC ("Springville") in the above-referenced case. Pursuant to Local Civil Rule 7.1(d) and Section F.1 of Your Honor's *Individual Practice Rules*, Plaintiffs Mariano Benitez and Keith Hobbs (collectively, "Plaintiffs") and Springville jointly move the Court for an extension of time through and including Friday, July 3, 2020, in which Springville may move or plead in response to the Complaint.

According to the Summons, (ECF # 9), Springville was served on April 29, 2020. Defense counsel was recently retained and requires time to investigate this matter and vet Plaintiffs' claims. Such efforts are further complicated by the ongoing global pandemic. Currently, Springville's response to the Complaint is due Friday, June 19, 2020. There has been one previous request for an extension, which was granted (ECF # 11). Plaintiffs' counsel was contacted prior to this filing and consents to the extension.

Accordingly, the parties respectfully request that the deadline for Springville to respond to the Complaint be extended by fourteen (14) days from the current deadline—to Friday, July 3, 2020.

Respectfully submitted,

/s/ Andrew T. Hambelton  
Andrew T. Hambelton

cc: All Plaintiffs' counsel (via ECF)  
All Defendant's counsel (via Email)